



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Jacob K. Javits Federal Building
26 Federal Plaza, 37th Floor
New York, New York 10278*

April 3, 2025

BY ECF

The Honorable Katherine Polk Failla
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

MEMO ENDORSED

Re: *United States v. Julio Marin Gonzalez, 23 Cr. 180 (KPF)*

Dear Judge Failla:

The parties write to respectfully request a 60-day adjournment of the status conference currently scheduled for April 9, 2025. The parties recognize that the Court indicated in February that it is not inclined to grant additional adjournments absent exigent circumstances but submit that the adjournment would serve the ends of justice and judicial economy by (i) allowing the defense adequate time to review additional discovery materials recently produced by the Government, and (ii) allowing the parties to confer, in light of all the evidence, about a possible pretrial resolution. For the same reasons, the Government, with the consent of the defendant, also respectfully requests that the Court exclude time under the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7)(A), until the date of the next conference.

Respectfully submitted,

MATTHEW PODOLSKY
Acting United States Attorney

By: _____ /s/
Nicholas S. Bradley / Jane Y. Chong
Sarah L. Kushner / David J. Robles

Assistant United States Attorneys
(212) 637-2263

CC: Counsel of Record (by ECF)

Enclosure

Application DENIED. As the Court stated in its February 5, 2025 order, no further adjournments of this conference will be granted absent exigent circumstances. As the above does not constitute exigent circumstances, the Court wishes to hear from the parties at the scheduled conference regarding the status of this case.

The Clerk of Court is directed to terminate the pending motion at docket entry 189.

Dated: April 4, 2025

SO ORDERED.

New York, New York



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE